

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff,**

vs.

**RAUL GONZALEZ, JR.
Defendant.**

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CAUSE NO. 5:13-CR-00785-OLG

**RESPONSE TO GOVERNMENT'S MOTION
FOR A PRELIMINARY ORDER OF FORFEITURE**

[MR. GONZALEZ HAS NO INTEREST IN THE DESCRIBED REAL PROPERTIES]

**TO THE HONORABLE JUDGE ORLANDO L. GARCIA OF THE UNITED STATES
DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO
DIVISION:**

NOW COMES the Defendant, RAUL GONZALEZ, JR., by and through his undersigned counsel and files this Response to the Government's Motion for a Preliminary Order of Forfeiture.

1. The Government states that it desires for this Court to find, upon no evidence presented, that he has an interest in the real property listed in the Government's Motion for a Preliminary Order of Forfeiture. Mr. Gonzalez has no current interest whatsoever in the listed real property and is unaware whether he has any future interest. Such future interest, would be speculative.
2. He entered a plea agreement agreeing, not that he had any interest in the real property, but that he agreed to forfeit his interest, if any, in such property. He stands by that agreement. However, he contests the Government's request for the Court to find that he has an interest in the real property. He has none.

3. Therefore, the Government has nothing to seize with respect to the real properties and a preliminary order allowing the same, would be improper.
4. Mr. Gonzalez does not contest the Government's motion for a preliminary order to forfeit \$121,000 in United States Currency on the basis that this is what he agreed to in his plea agreement.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully prays that this Honorable Court deny the Government's request that it find, upon no evidence, that he has any ownership interest in the real property listed in the Government's motion and for any further relief this Honorable Court deems just and proper.

Respectfully submitted:

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By: /s/ Cynthia E. Orr
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Attorneys for Defendant,
RAUL GONZALEZ, JR.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Response to the Government's Motion for a Preliminary Order of Forfeiture has been electronically delivered to Assistant United States Attorney Russell Leachman and Assistant United States Attorney Mary Nelda Valadez, as a registered participant to the CM/ECF document filing system, on this the 7th day of December, 2014

By: /s/ Cynthia E. Orr
CYNTHIA E. ORR